

REMARKS

The present amendment is in response to the Office Action dated December 15, 2005, where the Examiner has rejected claims 1-30. By the present amendment, claims 20-21 have been amended. Claims 1-30 are thereby pending in the present application. Reconsideration and allowance of pending claims 1-30 in view of the amendments and the following remarks are respectfully requested.

A. Response to Objection to the Drawings

In the Office Action, the Examiner objected to the drawings, finding that 1) element 32 is not mentioned in description; 2) both 41 and 51 have been used to designate an end of file indicator; and 3) Fig. 1 does not include element 54 as mentioned in the description.

In response, the applicant has amended Fig. 1 to delete reference character 32. Further, reference character 41 has been moved to point more directly to the "END" indicator. No other changes to Fig. 1 have been made. A replacement sheet is attached to the end of this Response. No mark-up sheet is provided, but will be provided upon request by the Examiner.

The applicant has also amended the first paragraph of page 10 of the specification as filed. A replacement paragraph has been provided, showing that the "end of file indicator" has been changed from "51" to "41", and that the "file identifier" has been changed from "54" to "45". Accordingly, the end of file indicator is consistently referenced by character "41", and character "54" is no longer in the specification.

The applicant believes that the described amendments to Fig. 1 and the replacement paragraph address all the objections raised by the Examiner, and request that the Examiner withdraw the objection to the drawings. No new matter has been added, but only corrections to scrivener's errors.

B. Response to Rejection of Claims 20-23 under 35 USC §101

In the Office Action, the Examiner rejected claims 20-23 under 35 USC §101, as being directed to non-statutory subject matter. In response, the applicant has amended claims 20-21 to more clearly define that the segment files are on a computer readable medium, and store respective subsets of images. The applicant believes this amendment defines sufficient structural and functional interrelationships under 35 USC §101.

C. Response to Rejection of claims 1-4, 7-14, 16-18, and 20-30 under 35 USC §103(a)

In the office action, the Examiner rejected claims 1-4, 7-14, 16-18, and 20-30 under 35 USC 103(a) as being unpatentable over Carmel (U.S. patent number 5,841,432) in view of Obrador (U.S. publication number 2003/0191776). The applicant respectfully traverses this rejection, and submits that the cited references fail to disclose all the limitations of the independent claims 1, 13, 17, 20, and 24.

1. Neither Carmel nor Obrador Disclose a Callback Identifier for an Animation Segment

Referring first to independent claim 1, the claimed method has a first segment file and a second segment file, with each segment file having a set of images that display an animation segment. The first segment file has a callback identifier, that when retrieved, is used to load the second segment file. In this way, an animation segment is able to 1) identify, 2) call, and 3) enable the loading of another segment file. As claimed, the first segment has the same callback identifier as the second segment. For example, Figure 1 of the specification shows that the first segment 23 has a callback instruction of "A2" (34). This same callback instruction "A2" is used as the file identifier for the second file segment 25. *See also, the specification as published, pg. 13, lns. 8-20.*

By having a previous animation segment identify and “call” a next animation segment, the animation segments are directly linked into proper order, enabling an embedded processor to play long animations. *See, specification as published, pg. 5, Ins. 13-17.*

Neither Carmel nor Obrador disclose a callback identifier for an animation segment. As stated by the Examiner, Carmel “does not specifically teach retrieving the callback identifier from the first segment file,[or] using the callback identifier to load the second set of images into the animation processor according to the second segment file.” Such a callback is not used in Carmel, since Carmel does not even address the ordering of animation segments. Instead, Carmel carefully defines each “segment” to be merely an individual frame. *See, Carmel, col. 4, Ins. 8-10.* In operation, Carmel first sends a “general information” block, and then sends the frames in sequential display order. *Carmel, col. 4, Ins. 45-54.* Accordingly, no callback identifier or callback function is ever used.

Since Carmel does not have any callback identifier, and cannot disclose the use of use of a callback identifier to call a second segment, the Examiner cites to Obrador. But Obrador, too, fails to disclose any callback identifier, or the use of any callback identifier to link a first segment to a second segment. Instead, Obrador has a media manager that indexes individual media objects to enable a user to browse through a collection. *See, Obrador, paragraph 0027.* As described, Obrador uses a media manager 12 to browse through indexed media objects. In this way, the link between media objects is made through the media manager, and is not made by any direct link between the objects. More specifically, Obrador does not show any media object having an identifier that calls another media object having that same identifier. Instead, Obrador merely shows that a “data structure” may have an index that has its “starting point” and “length”. *See, Obradro, paragraph 0036.* As further evidence, no figure of Obrador shows any sequence calling another sequence. For example, Figures 3 and 4 show that data structures are merely sequentially used, and that key data is extracted for use by a media manager. No callback identifier is ever used to identify or call another animation segment. Further, Figures 8A, 8B, 8C, and 8D

all show that sequences are linked to a main video file. No link is ever shown between one sequence and another sequence. Accordingly, Obrador does not overcome the deficiency the Examiner found in Carmel.

As described above, neither Carmel nor Obrador disclose 1) a first animation segment having a callback identifier, 2) retrieving that callback identifier from the first segment to identify a second segment file, and 3) using the callback identifier to load the second segment file. Accordingly, the applicant submits that Carmel and Obrador cannot render claim 1 or its dependent claims obvious.

In rejecting independent claim 13, the Examiner relies on the rejection of claim 1. In a similar manner, the Applicant submits, for reasons similar to those set forth in the discussion of claim 1, that Carmel and Obrador cannot render claim 13 or its dependent claims obvious.

In rejecting independent claim 17, the Examiner relies on the rejection of claim 1. In a similar manner, the Applicant submits, for reasons similar to those set forth in the discussion of claim 1, that Carmel and Obrador cannot render claim 17 or its dependent claims obvious.

In rejecting independent claim 20, the Examiner relies on the rejection of claims 1 and 17. In a similar manner, the Applicant submits, for reasons similar to those set forth in the discussion of claims 1 and 17, that Carmel and Obrador cannot render claim 20 or its dependent claims obvious.

In rejecting independent claim 24, the Examiner relies on the rejection of claims 1 and 17. In a similar manner, the Applicant submits, for reasons similar to those set forth in the discussion of claims 1 and 17, that Carmel and Obrador cannot render claim 24 or its dependent claims obvious.

D. Response to Rejection of claims 5, 6, 15, and 19 under 35 USC §103(a)

In the office action, the Examiner rejected claims 5, 6, 15, and 19 under 35 USC 103(a) as being unpatentable over Carmel (U.S. patent number 5,841,432)

in view of Obrador (U.S. publication number 2003/0191776), and further in view of Crosby (U.S. patent number 5,113,493).

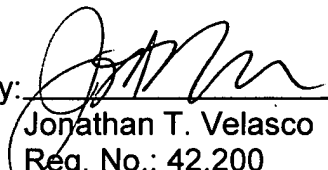
As described in section C above, the applicant believes that independent claims 1, 13, and 17 are now allowable, and therefore, claims 5, 6, 15, and 19 are allowable based on their dependency from their respective allowable independent claim.

E. Conclusion

For all the foregoing reasons, an allowance of claims 1-30 pending in the present application is respectfully requested.

Respectfully submitted,

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